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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 DANNI GUO and JIAWEI LU,  
11 Plaintiffs,  
12 vs.  
13 8BO.COM and Others,  
14 Defendants.  
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: Case No. 13-cv-05299 NC  
:  
:  
: **DECLARATION OF MARIE**  
: **MCCANN IN SUPPORT OF**  
: **PLAINTIFFS' MOTION FOR**  
: **WAIVER OF SERVICE BY**  
: **POSTAL MAIL AND**  
: **PUBLICATION, OR IN THE**  
: **ALTERNATIVE FOR**  
: **SERVICE BY PUBLICATION**  
:  
: **Hon. Nathanael Cousins**

17 **Date: April 23, 2014**  
18 **Time: 1:00 pm**  
19 **Courtroom: A, 15th Floor**

20 I, Marie McCann, under penalty of perjury under the laws of the United States,  
21 hereby declare pursuant to 28 U.S.C. § 1746 as follows:

- 22 1. I am counsel for Plaintiffs Danni Guo and Jiawei Lu in this action and make this  
23 Declaration in support of Plaintiffs' Motion for Waiver of Service by Postal Mail and  
24 Publication, or in the Alternative for an Order Directing Service by Publication.  
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2. Plaintiffs are the owners of the domain names 8bo.com, 5123.com, boti.com, huati.com and 16688.com (collectively “Defendant Domains”).
3. On December 19, 2013, I sent four emails to the email address contact@privacyprotect.org, the email address listed in the “registrant” section of the Whois records for the Defendant Domains 8bo.com, 5123.com, boti.com and huati.com. The emails contained a notice of the lawsuit, including a copy of the Complaint, Order Setting Initial Case Management Conference and ADR Deadlines, Order Directing Non-Party to Comply and Standing Orders. True and correct copies of these emails are attached hereto as Exhibit A.
4. Also on December 19, 2013, I sent a notice of the lawsuit, including a copy of the Complaint, Order Setting Initial Case Management Conference and ADR Deadlines, Order Directing Non-Party to Comply and Standing Orders, to the email address smakeliao@foxmail.com, the email address listed in the “registrant” section of the Whois record for the Defendant Domain 16688.com. A true and correct copy of the email is attached hereto as Exhibit B.
5. On January 27, 2014, I filed a notice of the lawsuit to the “Contact Domain Owner” online form on the website of privacyprotect.org (the “Privacy Service”) for each of the Defendant Domains 8bo.com, 5123.com, boti.com and huati.com. A copy of the Complaint, Order Setting Initial Case Management Conference and ADR Deadlines, Order Directing Non-Party to Comply and Standing Orders were uploaded as an attachment thereto.
6. On February 28, 2014, I checked the Whois record for Defendant Domain 16688.com. As of that date, the Whois record had been updated to reflect contact

1 information for the Privacy Service in the “registrant” section. A true and correct  
2 copy of the Whois record is attached hereto as Exhibit C. Once I learned of the  
3 update, I emailed copy of the Complaint, Order Setting Initial Case Management  
4 Conference and ADR Deadlines, Order Directing Non-Party to Comply and Standing  
5 Orders to the email address provided – contact@privacyprotect.org. A true and  
6 correct copy of the email is attached hereto as Exhibit D. A notice of the lawsuit was  
7 also filed to the “Contact Domain Owner” form on the Privacy Service website and  
8 the above listed documents uploaded as attachments thereto.  
9

- 10 7. As of March 13, 2014, all of the Defendant Domains list contact information of the  
11 Privacy Service in the “registrant” section of the Whois records. A true and correct  
12 copy of the Whois records for the Defendant Domains are attached hereto as Exhibit  
13 E.  
14  
15 8. As of March 13, 2014, the website of the Privacy Service displays the following text  
16 on the home page: “We DO NOT accept Postal mails. All postal mails sent to our PO  
17 Box address are rejected. Please use the Contact Domain Owner form below to  
18 contact the domain name owner.” A screenshot of the website is attached hereto as  
19 Exhibit F.

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1 9. This Motion and Proposed Order will be emailed the registrants for each of the  
2 Defendant Domains as well as uploaded to the "Contact Domain Owner" form on the  
3 Privacy Service website for each of the Defendant Domains.  
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6 RESPECTFULLY SUBMITTED,

7 DATED: March 14, 2014

8 By: /s/ Marie E. McCann

9 Marie E. McCann

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